

### REMARKS

The present application was filed on September 11, 2003 with claims 1 through 20. Claims 1 through 20 are presently pending in the above-identified patent application.

In the Office Action, the Examiner rejected claims 1-4, 7-10, and 13-18 under 35 U.S.C. §103(a) as being unpatentable over Babu et al. (United States Patent Application Number 2003/0130855) in view Yang et al. (United States Patent Number 6,801,141). The Examiner indicated that claims 5-6, 11-12, 16, and 19-20 would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims.

#### Independent Claims 1, 7 and 13

Independent claims 1, 7, and 13 were rejected under 35 U.S.C. §103(a) as being unpatentable over Babu et al. in view Yang et al. In particular, the Examiner acknowledges that Babu does not disclose a grammar based lossless data compression scheme and does not disclose a lexicographic and/or Foata normal form, but asserts that both forms call for ordering/sorting the input string and, hence, can be processed in the compression scheme of Babu.

Applicant notes that Babu is directed to a method for generating a data model for compressing a data table (see, Abstract). The utilization of the lexicographic and/or Foata normal forms in the present invention implies that a model for the data already exists and has been selected. Thus, a person of ordinary skill in the art would *not* look to utilize the method disclosed by Babu since a model does not need to be generated or selected. Applicant also notes that the cited prior art does *not* disclose utilizing only a single pass over the input string. Independent claim 1 requires generating a lexicographic normal form from said input string, using only a single pass over said input string; and applying a compression scheme to said lexicographic normal form. Independent claim 7 requires generating a Foata normal form from said input string; and applying a compression scheme to said Foata normal form. Independent claim 13 requires generating a normal form from said input string, using only a single pass over said input string; and applying a compression scheme to said normal form.

Thus, Babu et al. and Yang et al., alone or in combination, do not disclose or suggest generating a lexicographic normal form from said input string, using only a single pass over said input string; and applying a compression scheme to said lexicographic normal form, as required by

independent claim 1, do not disclose or suggest generating a Foata normal form from said input string; and applying a compression scheme to said Foata normal form, as required by independent claim 7, and do not disclose or suggest generating a normal form from said input string, using only a single pass over said input string; and applying a compression scheme to said normal form, as required by independent claim 13.

Dependent Claims 2-6, 8-12 and 14-20

Dependent claims 2-4, 8-10, and 14-18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Babu et al. in view Yang et al. Applicant notes that the Examiner has indicated that claim 16 is both rejected and allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims.

Claims 2-6, 8-12 and 14-20 are dependent on claims 1, 7, and 13, respectively, and are therefore patentably distinguished over Babu et al. and Yang et al. (alone or in any combination) because of their dependency from independent claims 1, 7, and 13 for the reasons set forth above, as well as other elements these claims add in combination to their base claim. The Examiner has already indicated that claims 5-6, 11-12, 16, and 19-20 would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims.

All of the pending claims, i.e., claims 1 through 20, are in condition for allowance and such favorable action is earnestly solicited.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Kevin M. Mason".

Date: February 14, 2005

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